

# **Exhibit 1**

## **(March 16, 2021 Letter)**

# SPARACINO

PLLC

1920 L Street, NW, Suite 535  
Washington, D.C. 20036

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March 16, 2021

**VIA FEDEX**

Mr. Sean Sherk



### **RE: Potential Antitrust Claims Against UFC**

Dear Mr. Sherk,

We are writing to you because we believe developments in a recent court case called *Le v. Zuffa* suggests you may have legal claims relating to your time as an MMA competitor in the UFC. We are an investigative firm that focuses on helping people who, like you, may have been wronged by unlawful business practices. We have partnered with Scott+Scott, a litigation firm that represents clients in complex antitrust and competition cases where there has been price fixing and monopolization.

Our firms have investigated the UFC's conduct and we believe, if the logic of a recent judicial opinion is correct, that you may have legal claims concerning whether you were paid the full value of your skills and performance. In a case called *Le v. Zuffa*, a federal judge recently ruled that MMA athletes who competed in UFC events in the United States between 2010 and 2017 may have claims for compensation against the UFC under our Nation's antitrust law, the Sherman Act. Depending on your history with UFC, based on the judge's logic in *Le v. Zuffa*, you may be able to allege that UFC did this by purposefully eliminating its competitors—competitors who could have hired you or made UFC purses bigger as they competed for your skills. In light of the ruling in *Le v. Zuffa*, we believe you could be entitled to substantial additional compensation—what you should have been paid when you were fighting. We intend to represent MMA professionals who wish to explore whether they may have claims relating to their time in UFC, and we hope you will join us in that effort.

My law firm, Sparacino PLLC, was created to bring similar federal lawsuits on behalf of Americans who band together to pursue legal claims against a common defendant. For example, we currently represent more than 2,500 Americans—including hundreds of seriously injured soldiers and Marines—who were injured by terrorist attacks. Our partner Scott+Scott has won significant antitrust cases against formidable opponents, and they share our view that you may have a strong case.

Because we feel that you deserve to know about your legal options, we identified you through internet research,<sup>1</sup> obtained your contact information through a database called Lexis that many lawyers and non-lawyers use to help find people, and then we sent you this letter.

<sup>1</sup> Specifically, <https://www.tapology.com/search?term=Sean+Sherk>.

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We would be honored to represent you if your claim is viable and you choose to sue UFC. I am a life-long fan of MMA, and I have always deeply admired competitors who put it all on the line inside the Octagon. It would be an honor to fight in the legal arena on your behalf.

**We will never ask you to break any agreement you have with UFC, and we will never discourage you from fighting in any UFC event, working for any UFC entity, or otherwise participating in any venture with UFC or anyone associated with UFC. We have reached out to you only because we think you may have a substantial legal claim relating to your time as an MMA fighter, and we would be happy to represent you as your lawyer if you agree, we determine your claim has merit, and you agree to our normal engagement letter. Regardless of your decision, however, Sparacino PLLC and Scott+Scott are not in any way encouraging you to change any contractual, employment, or other legal relationship you currently have, or may have, with UFC or anyone associated with UFC. If you already have legal counsel with respect to your potential antitrust claims, please ignore this letter.**

We have enclosed materials describing the cases. I am free to talk to you anytime. Please call at your convenience (202-629-9740) or email (ryan.sparacino@sparacinoplcc.com) to arrange a time to talk, including nights or weekends.

Yours truly,



Ryan R. Sparacino, Managing Partner  
Licensed to practice law in Washington, DC only (Inactive in Virginia)